

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

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THE UNITED STATES OF AMERICA,	:	
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	:	
v.	:	18-CR-108-EAW
	:	
ROBERT C. MORGAN, et al.	:	
	:	
<i>Defendants.</i>	:	
	:	
-----X	:	

**NOTICE OF MR. ROBERT C. MORGAN'S RENEWED MOTION FOR DISCOVERY
REGARDING THE GOVERNMENT'S PRIVILEGE REVIEW**

PLEASE TAKE NOTICE that the Defendant Robert C. Morgan, through his undersigned counsel, moves this Court at the United States District Court for the Western District of New York, Kenneth B. Keating Federal Building, 100 State Street, Rochester, New York 14614, for an Order requiring the government to immediately produce (1) the identity of the individuals who comprise the government's filter team and (2) the written protocols governing the filter team's privilege review.

PLEASE TAKE FURTHER NOTICE that, in support of its motion, Mr. Morgan relies upon the accompanying Memorandum of Law, and the Declaration of Joel M. Cohen with Exhibits A–E.

Pursuant to Local Rule 7(a)(1), Mr. Morgan states that he intends to file and serve reply papers as needed. Mr. Morgan reserves the right to file, with the Court's permission, additional papers in connection with the evidentiary hearing on this Motion.

Dated: June 18, 2020
New York, New York

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By: /s/ Joel M. Cohen
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